

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

United States of America,

Plaintiff,

v.

Sixteen Thousand Seven Hundred Sixty-
Five Dollars in U.S. Currency
(\$16,765.00), et. al.,

Defendants.

Civil Case No. 1:15-CV-1036

Judge Christopher Boyko

**AMENDED VERIFIED CLAIM OF IRIS
KARINA BAKER**

Pursuant to Rule G(5) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, Iris Karina Baker, hereby provides an Amended Verified Claim asserting an ownership and possessory interest in, and the right to exercise dominion and control over, the following assets and/or property that are the subject of the Complaint in Forfeiture, which was filed on May 22, 2015, to wit:

1. \$24,239.28 seized from Third Federal Savings & Loan, Checking Account Number XXXXX2841 on January 21, 2015 in Cleveland, Ohio;

This account is a custodial account administered by Claimant Baker. Claimant Baker opened this account approximately eight years ago for her daughter. This account contains funds earned through legitimate employment. On occasion, money was withdrawn from this account for purposes of covering school expenses such as books and tuition for Chelsea Baker.

2. \$4,013.40 seized from Third Federal Savings & Loan, Savings Account Number: XXXXXX8007 on January 21, 2015 in Cleveland, Ohio;

This account is a personal account. Claimant Baker opened this account and is the only signatory on this account. Money was withdrawn from this account for purposes of paying personal bills. This account contains funds legitimately earned through employment.

3. \$79,270.73 seized from First Merit Bank, Checking Account Number: XXXXXX4053 on January 21, 2015 in Akron, Ohio;

This account is a commercial checking account used by Enhanced Telecommunication Services, Inc. to conduct legitimate business transactions. Funds contained in this account are used for business expenses such as payroll, office expenses, insurance premiums, and refund checks. The account was opened by Claimant Baker in 2002 when Enhanced Telecommunications, Inc. opened. Claimant Baker is the only signatory on this account.

4. 2009 Infiniti QX56, Vehicle Identification Number of: 5N3AA08C69N901781 seized on January 21, 2015 in Willoughby, Ohio;

This vehicle is Claimant Baker's personal vehicle. Claimant Baker purchased the vehicle in 2008 by means of a multi-year auto loan. Claimant Baker repaid the loan and is the sole titleholder of the vehicle.

5. \$7,876.62 seized from Huntington National Bank, Business Checking Account Number: XXXXXXXX2900 on January 21, 2015 in Columbus, Ohio;

This account is a commercial checking account used by Enhanced Telecommunication Services, Inc. Claimant Baker opened the account on or about June of 2014 and is the only signatory on this account. The initial deposit to this account came from First Merit Bank, Checking Account Number XXXXXX4053. All remaining funds in this account originated from a business loan from Huntington Bank. Claimant Baker is the guarantor for the loan from Huntington Bank.

6. \$209,793.14 seized from Charles Schwab & Co., Brokerage Account Number: XXXX9544 on January 22, 2015 in San Francisco, California;

This account is an individual investment account opened on December 15, 2008. Claimant Baker opened this account and is the only signatory on this account. This account was funded with income legitimately earned through employment. Funds in this account have been invested into bond mutual funds and stock mutual funds.

7. \$5,093.16 seized from American Funds, CB&T CUST IRA Account Number: XXXX6729 seized on January 22, 2015 in Carmel, Indiana;

This account is an IRA retirement account opened on January 12, 2012. Claimant Baker opened this account and is the only signatory on this account. This account contains funds legitimately earned through employment. The beneficiary is Claimant Baker's son Brandon Selvaggio.


8. \$5,266.41 seized from American Funds, CB&T CUST ROTH IRA Account Number: XXXX1832 on January 22, 2015 in Carmel, Indiana;

This account is a custodial Roth IRA retirement account administered by Claimant Baker. Claimant Baker opened the account on April 15, 2008. This account contains funds legitimately earned through employment.

9. \$147,698.30 seized from American Funds, CB&T CUST Simple IRA Account Number: XXXX3285 on January 22, 2015 in Carmel, Indiana.

This account is a Simple IRA account opened on October 8, 2004. Claimant Baker opened this account and is the only signatory on this account. This account contains funds legitimately earned through employment. The beneficiaries are Claimant Baker's daughter Chelsea Baker and son Brandon Selvaggio.

Dated: 30 June 2015



Iris Karina Baker

VERIFICATION

The undersigned declares under penalty of perjury that she is a Claimant in the above-entitled matter, that she has read the foregoing Amended Verified Claim, that she knows the contents thereof, and that the same is true of her own knowledge.

Dated: 30 June 2015



Iris Karina Baker

CERTIFICATE OF ELECTRONIC SERVICE

I hereby certify that on the 30th day of June 2015, I caused to be electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all parties indicated on the electronic filing receipt.

/s/ Ian N. Friedman

Ian N. Friedman (0068630)

Kristina W. Supler (0080609)

McCarthy, Lebit, Crystal & Liffman Co., L.P.A.

101 West Prospect Avenue

Suite 1800

Cleveland, OH 44115

Counsel for Claimant Iris Karina Baker